

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CASE NO: 1:23-cv-04708

TAYLOR D. PENDLETON, an individual,

Plaintiff,

v.

10Q LLC, a California Limited Liability  
Company PROPELR MUSIC, LLC, an Illinois  
Limited Liability Company; MARRIANI  
RECORDS, an Illinois corporation; ANTOINE  
REED p/k/a “Sir Michael Rocks,” an individual;  
and DOES 1 through 5, inclusive,

Defendants.

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**PLAINTIFF’S MOTION FOR EXTENSION OF TIME TO SERVE SUMMONS  
AND COMPLAINT, OR FOR ALTERNATIVE SERVICE**

NOW COMES Plaintiff, TAYLOR D. PENDLETON, (the “Plaintiff” or “Pendleton”), by and through undersigned counsel, and pursuant to Federal Rules of Civil Procedure, Rule 6(b), hereby files this Motion for Extension of Time to Serve Summons and Complaint, or for Alternative Service (the “Motion for Extension of Time”) on Defendant Antoine Reed p/k/a “Sir Michael Rocks” (“Reed” or “Defendant”). The grounds for this motion are as follows:

1. The complaint (the “Complaint”) in the above-styled matter was filed on July 20, 2023, which commenced litigation proceedings in this Court [DE 1].
2. Pursuant to Federal Rules of Civil Procedure, Rule 4(m), the Plaintiff had “90 days after

Filing” the Complaint to serve all of the Defendants, including Reed; however, this Court “shall extend the time for service” upon a showing of “good cause” or “excusable neglect”. *See* Fed. R. Civ. P. 4(m).

3. Currently all of the Defendants in this action have been served except for Reed [DE 11, 13, 14].

4. In fact, the Plaintiff has moved the Clerk of Court for entry of default pursuant to Rule 55(a) and defaults are pending or have been entered against all other Defendants in this action [DE 18, 20].

5. Through Plaintiff’s research, she found two (2) potential residential addresses in which for Reed: 1921 W Diversey Pkwy 202, Chicago, IL 60614 (“Residential Address 1”) and 1921 W Diversey Pkwy 202, Chicago, IL 60614 (“Residential Address 2”).

6. On or around April 1, 2024, the Plaintiff retained the services of a process serving company known as Countrywide Process Services, Inc (“Countrywide”) to effectuate service on Reed at the Residential Address 1.

7. By April 3, 2024, Countrywide had attempted to serve Reed at Residential Address 1.

8. Service, however, was not perfected at Residential Address 1 because the process server stated “There [wa]s no answer at the door after repeated knocking, calling up to the unit over intercom. Subject name [wa]s not listed for unit or in the directory. Mailbox for 202 has the name of Patel.” See a true and correct copy of the Countrywide Process Services, Inc. Status Report, attached hereto as Exhibit “A”.

9. By April 4, 2024, Countrywide had attempted to serve Reed at Residential Address 2.

10. Service, however, was not perfected at Residential Address 2 because the process server stated “There [wa]s no answer at the door after repeated knocking and doorbell ringing. There

[wa]s no movement heard inside. Lights were also off.” *Id.*

11. By April 5, 2024, Countrywide had attempted to serve Reed at Residential Address 1.

12. Service, however, was not perfected at Residential Address 1 because the process server stated “There [wa]s no answer at the door after repeated knocking, calling up to the unit over intercom. Subject name [wa]s not listed present on any signage or directory.” *Id.*

13. By April 5, 2024, Countrywide had attempted to serve Reed at Residential Address 2.

14. Service, however, was not perfected at Residential Address 2 because the process server stated “Bad Address. I spoke with the current resident who stated the subject is not a current resident and moved out within the last year.” *Id.*

15. By April 7, 2024, Countrywide had attempted to serve Reed at Residential Address 1.

16. Service, however, was not perfected at Residential Address 1 because the process server stated “Bad Address. I spoke with female individual over front door intercom who gave name of Patel. She also stated that she has lived in unit 202 since 2014. She confirmed that subject is not a resident and she [wa]s unfamiliar with the name.” *Id.*

17. In light of this latest attempt, Plaintiff has scoured the internet, social media, and she has found that Reed will be performing at The Promontory Chicago, located at 5311 S. Lake Park Ave. West, Chicago, Illinois 60615, on June 10, 2024. This performance gives Plaintiff a viable address and/or location in which to effect service on Reed.

18. It should be noted that Reed and the other Defendants previously shared the same counsel during which the parties engaged in settlement discussions, and therefore, Plaintiff reasonably believes that Reed is aware of this action but has and/or is evading service.

19. Notwithstanding this Court’s order permitting Plaintiff to serve Reed via email and/or alternative service, in light of Plaintiff’s discovery of Reed’s actual location for personal service as seen via Exhibit “X”, Plaintiff has filed this fourth request for an

extension of time to personally serve Reed.

20. Plaintiff submits that should she be unable to serve Reed at this appearance that she be permitted to use alternative service measures, such as email, as this Court authorized in its April 12, 2024 Order.

21. Based upon the foregoing, Plaintiff submits that good cause exists for this Court to extend the Plaintiff's time to serve Defendants pursuant to Fed. R. Civ. P. 4(m).

22. The Plaintiff submits that this motion has been submitted in good faith and not for the purpose of causing needless and undue delay.

23. The Plaintiff submits that this motion has been submitted in good faith and not for the purpose of causing needless and undue delay.

**WHEREFORE**, the Plaintiff respectfully requests that this Honorable Court enter an Order granting this Motion for Extension of Time, and that extends the deadline for which process may be served on REED by twenty (20) days to effectuate personal service at Reed's performance in Chicago, Illinois, and/ in the event that Plaintiff is unable to effectuate personal service on REED she shall use alternative means including email to serve REED in Cook County, Illinois, which is Reed's last known residence.

Dated this 3rd day of June 2024.

Respectfully submitted,

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THE LAW OFFICES OF KRISTINA T.  
WILSON P.C

s/Kristina T. Wilson

Kristina T. Wilson, Esq.

*Attorney for Plaintiff*, Taylor D. Pendleton

645 W. 9th Street

Unit # 110-376

Los Angeles, California

90015 Telephone: (323)

537-7795 CA Bar No.

330475

Email: [Wilson@KTWilsonLaw.com](mailto:Wilson@KTWilsonLaw.com)

Secondary Email:

[KTWilsonLaw@gmail.com](mailto:KTWilsonLaw@gmail.com)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been served on all parties or  
counsel of record who have appeared through the CM/ECF filing system this 3<sup>rd</sup> day of June  
2024.

Dated: June 3, 2024

s/Kristina T. Wilson